The following information was submitted:

## Name & Sponsoring Organization

First Name: Jan Last Name: Thorell

Are you submitting comments on behalf of a sponsoring organization? Yes

If yes, please enter the name of the organization: Biovator AB

## Comments and Questions

- 1. Do you have comments on the priority areas for the development and validation of alternative test methods listed above?
  - 1. It should be remembered that tests for acute allergic hyper-reactivity (type I reations) is a highly relevant area for continued development and that it combines both area 4 /Acute systemic toxicity/ and area 9 /Immunotoxicity/. In addition, the only validated tests for skin sensitization, /area 3/ is based on animal testing, and it deserves further exploration to develop cell based in vitro tests.
- 2. Considering available science and technology, what development, translation, and validation activities are most likely to have the greatest impacts within the next five years on refining, reducing, or replacing animal use?
  - 2. The knowledge of the cellular events involved in the allergic reaction has taken a great step forward in recent years. For this reason it is believed that the relevance of in vitro tests compares favourable with present animal tests. It will have a great impact on replacing animal testing, primarily by tests having more human-specific reactions than those reflected in animals
- 3. What research and development activities hold the greatest promise in the long-term for refining, reducing, or replacing animal use?
  - 3. The imperative demand from the public and the industry to have safe methods for immunotoxicology testing of materials and components in products from the cosmetic, pharmaceutical and food industries makes it an obvious target for the development of new and improved test methods.
- 4. What are appropriate measures for evaluating progress in enhancing the development and use of alternative test methods?
  - 4. The utilization of resources for the research, development and introduction of new in vitro tests by academia and industry

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